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Attorneys for Dreyer Babich Buccola Wood Campora, LLP

THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:) Case Nos. 19-30088 (DM)

PG&E CORPORATION,) Chapter 11

-and-

In re:) **MOTION FOR ORDER AUTHORIZING**
) **WITHDRAWAL OF COUNSEL TO**
) **MONICA HUCHRO AND MONICA**
) **HUCHRO AS TRUSTEE OF THE**
) **MONICA HUCHRO REVOCABLE TRUST**

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

DATE: August 13, 2024

TIME: 10:00 A.M.

PLACE: **Telephone/Videoconference**
<https://www.canb.uscourts.gov/calendars>

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

JUDGE: Hon. Dennis Montali

OBJECTION DEADLINE: **July 30, 2024**
(4:00 P.M. Prevailing Pacific Time)

** All papers shall be filed in the lead case, No. 19-30088(DM)*

1 Dreyer Babich Buccola Wood Campora, LLP (“Dreyer Babich”), counsel of record¹ for:
2 Monica Huchro and Monica Huchro as Trustee of the Monica Huchro Revocable Trust (collectively
3 “Creditors”), by and through its attorneys of record, respectfully submits this Motion for Order
4 Authorizing Withdrawal of Counsel to Monica Huchro and Monica Huchro as Trustee of the Monica
5 Huchro Revocable Trust (the “Motion”).
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7 **EVIDENTIARY SUPPORT**

8 This Motion is supported by the Declaration of Steve Campora, which is filed concurrently
9 herewith.
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11 **FACTUAL BACKGROUND**

12 1. On January 29, 2019, PG&E Corporation and Pacific Gas & Electric Company filed
13 petitions for relief under Chapter 11 of Title 11 of the United States Code with the United States
14 Bankruptcy Court, in and for the Northern District of California (the “Court”), commencing case
15 numbers 2019-30088 (DM) and 2019-30089 (DM) (collectively the “Bankruptcy Cases”).
16

17 *Declaration of Steve Campora, ¶4.*

18 2. The Court set a Claims Bar Date for October 21, 2019, which was later extended up
19 to and including December 31, 2019.

20 3. Dreyer Babich was retained by Creditors to represent them in the Bankruptcy Cases.

21 4. On October 2, 2019, Dreyer Babich timely filed two (2) separate Proofs of Claim in
22 the Bankruptcy Cases on behalf of Creditors, which were assigned claim number 34845 and 34923
23 (collectively the “Proofs of Claim”), seeking damages on behalf of Creditors from the Camp Fire.
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25 *Declaration of Steve Campora, ¶5.*

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¹ Dreyer Babich retained Pino & Associates to, among other things, assist it in filing this motion. Pino & Associates has no contractual or attorney/client relationship with Creditors.

5. Since the filing of the Proofs of Claim, irreconcilable differences have developed between Creditors and Dreyer Babich to such an extent that the attorney-client relationship has broken down and is no longer sustainable. *Declaration of Steve Campora*, ¶6.

6. Based on these circumstances, good cause exists for the Court to enter an order relieving Dreyer Babich as counsel for Creditors and excusing Dreyer Babich from transmitting documents filed in the Bankruptcy Cases relating to the Proofs of Claim to the Creditors.

ARGUMENT

Pursuant to Civil L.R. 11-5, entitled “Withdrawal from Case,” which is in force in the Northern District of California and is made applicable to these Bankruptcy Cases pursuant to B.L.R. 1001-2(a), entitled “**Incorporation of Civil Local Rules**” (emphasis found in original):

[c]ounsel may not withdraw from an action until relieved by order of the Court after written notice has been provided, reasonably in advance, to the client and to all other parties who have appeared in the case.

The Standing Committee on Professional Responsibility and Conduct of the State Bar of California has opined that “. . ., for purposes of the motion to withdraw, it will be sufficient to state words to the effect that ethical considerations require withdrawal or that there has been an irreconcilable breakdown in the attorney-client relationship.” Formal Opinion No. 2015-192.

In this case, after the filing of the Proofs of Claim, an irreconcilable breakdown of the attorney-client relationship between Creditors and Dreyer Babich has occurred. *Declaration of Steve Campora*, ¶6. This constitutes good cause for the Court to grant leave for Dreyer Babich to withdraw as counsel of record for Creditors.

To the extent that Creditors request that Dreyer Babich turn over any files or information to which they are entitled, Dreyer Babich will cooperate and transmit such files. *Declaration of Steve Campora*, ¶8.

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Upon granting of the Motion, Dreyer Babich will provide notice to the Trustee of the Fire Victim Trust (the “Trustee”) established for the claims arising out of the Camp Fire, so that the Creditors may be given access to their entire file with the Trustee. *Declaration of Steve Campora,*

¶9.

CONCLUSION

For the reasons set forth herein, it is respectfully requested that the Court enter an Order:

1. Granting the Motion; and
2. Authorizing Dreyer Babich to withdraw as counsel for record for Creditors; and
3. Authorizing Dreyer Babich to provide actual notice of its withdrawal as counsel for the Creditors to the Trustee; and
4. Excusing Dreyer Babich from transmitting documents filed in the Bankruptcy Cases, including but not limited to the documents related to the Proofs of Claim, to the Creditors; and

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5. Directing all parties, including the Trustee, in the Bankruptcy Cases to transmit all appropriate notices and pleadings directly to the Creditors at the following addresses:

Monica Huchro 6224 Harvey Road Paradise, CA 95969	Monica Huchro as Trustee of the Monica Huchro Revocable Trust 6224 Harvey Road Paradise, CA 95969
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6. For such further relief as is fair, just, and equitable, whether or not specifically requested herein.

Respectfully submitted,

Dated: July 16, 2024

Dated: July 16, 2024

**DREYER BABICH BUCCOLA WOOD
CAMPORA, LLP**

PINO & ASSOCIATES

By: _____
Steve Campora, Counsel for
Creditors, Monica Huchro and Monica
Huchro as Trustee of the Monica Huchro
Revocable Trust

By: /s/ Estela O. Pino
Estela O. Pino, Counsel for
Dreyer Babich Buccola
Wood Campora, LLP